

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

SAVVY DOG SYSTEMS, LLC, and
POM of Pennsylvania, LLC,

Plaintiffs,

v.

PENNSYLVANIA COIN, LLC, and PA
COIN HOLDINGS, LLC

Defendants.

CIVIL ACTION NO: 3:19-cv-01470-RDM

Honorable Robert D. Mariani

DEFENDANTS' MOTION TO DISMISS

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, defendants Pennsylvania Coin, LLC and PA Coin Holdings, LLC hereby move to dismiss the Complaint filed by plaintiffs Savvy Dog Systems, LLC and POM of Pennsylvania, LLC (Dkt. 1) on the bases that (1) U.S. Patent No. 7,736,223 is directed to patent-ineligible subject matter under 35 U.S.C. § 101 and (2) the Complaint fails to state a plausible claim for relief. The reasons for this Motion are set forth in the accompanying brief in support, which is incorporated herein by reference.

Pursuant to Local Rule 7.1, the undersigned sought concurrence from Plaintiffs' counsel regarding the requested dismissal of the Complaint, and Plaintiffs' counsel did not provide concurrence to relief sought herein.

Dated: October 18, 2019

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/John V. Gorman

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CERTIFICATE OF SERVICE

I hereby certify that Defendants' Motion to Dismiss was filed on this 18th day of October, 2019 via the Court's CM/ECF filing system, which will send electronic notice of such filing to all counsel of record.

/s/John V. Gorman
John V. Gorman